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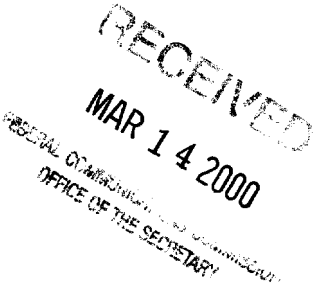
Industrial Telecommunications Association, Inc.

March 14, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW, TW-A325
Washington, DC 20554



Re: Petition for Rule Making

Dear Ms. Salas:

On November 15, 1999, the Alliance of Motion Picture and Television Producers (AMPTP) submited a Petition for Rule Making regarding the operation of wireless video assist devices on vacant television channels in the 174-300 MHz and the 470-746 MHz bands at power levels not to exceed 2 watts. The petition contained a typographical error as the vacant channels sought should be in the 174-216 MHz and the 470-746 MHz bands. Therefore, we hereby amend the petition to state the correct range of frequencies – 174-216 MHz and 470-746 MHz.

We believe that there is a broad range of support in the broadcast industry for AMPTP's proposal and are hopeful that the submitted petition can form the basis for the Commission to issue a Notice of Proposed Rule Making to initiate the appropriate rule changes. In light of the needs of the motion picture and television producers for this product, we urge the Commission to act expeditiously on this proposal.

If we can be of further assistance, please do not hesitate to contact us. We look forward to working with the Commission's staff to implement the necessary rule changes.

Sincerely,

Laura L. Smith, Esq.
On behalf of the Alliance of Motion Picture and Television Producers

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cc: Julius Knapp, OET

Enclosure

CICS Council of Independent Communication Suppliers
TELFAC Telephone Maintenance Frequency Advisory Committee
TLCC Taxicab and Livery Communications Council
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Alliance of Motion Picture and Television Producers	)	**RM-** _____
	)	
	)	
Petition to Amend Part 74 of the Commission's Rules to Permit Operation of Wireless Video Assist Devices	)	
	)	

To the Secretary:

PETITION FOR RULE MAKING

The Alliance of Motion Picture and Television Producers (AMPTP) is a non-profit trade association of companies engaged in the production of motion pictures and television programming. AMPTP represents in excess of 300 of the major and independent producers of motion pictures and television programs with respect to industry-wide collective bargaining agreements. The AMPTP is a Federal Communications Commission certified frequency advisory committee that coordinates applications on behalf of film and video production industry applicants seeking authority to operate business and industrial/land transportation radio stations on frequency assignments allocated between 30-900 MHz

I. Introduction

The AMPTP hereby requests that the Commission, pursuant to Section 1.401(a) of the Commission's rules,[1] amend Part 74 to permit the operation of low-power

[1] *See* 47 C.F.R. § 1.401(a) ("Any interested person may petition for the issuance, amendment or repeal of a rule or regulation.").

wireless video assist devices on vacant television channels in the 174-216 MHz and 470-746 MHz channels at power levels not to exceed 2 watts. Authorizing wireless video assist devices to operate on vacant VHF and UHF television channels would serve the public interest by maximizing use of the radio spectrum and providing a much needed service to the television and motion picture production industry. The Commission has recognized the value of allowing similar devices, such as wireless microphones, to utilize the unused television frequencies when it authorized these devices on the same VHF and UHF channels.[2]

II. Overview of Wireless Video Devices

Wireless video assist devices will be widely used by the television and motion picture production industry and will enable production crews to continuously monitor several camera angles while allowing the actors the freedom of movement throughout the set. They will ensure that costly and time consuming reshoots are not necessary. In short, they will create efficiency on the set and ultimately result in lower film and television production costs.

The ability of a director to accurately see what is being recorded is essential to the production of high quality television and motion picture programs. To this end, film cameras can be adapted with black and white or color video taps. These taps create a light path to a small video camera that generates a picture with enough resolution to allow for content decisions on a set or remote location. This system is called "video assist." The picture created by these cameras would then be used by the director for composing shots, *i.e.*, making sure that every element is properly framed. In multi-

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[2] *See* In the Matter of Review of Subpart H, Part 74 of the Commission's Rules, Low Power Auxiliary Stations, *First Report and Order*, 2 FCC Rcd 345 (1987) ("we will allow LPAS [low power

camera productions, the director could coordinate camera moves by simultaneously viewing pictures from all of the video assist cameras.

In addition to the director, video assist cameras would be used by several other members of the production crew. For instance, the director of cinematography can use the video assist images to ensure adequate lighting for the look he/she is trying to compose. Also, producers would use video assist cameras to view the framed picture in order to make judgments regarding program content. The camera crew would also use these devices to check image framing in conjunction with the camera viewfinder. Finally, video assist cameras would make a full rehearsal, without the use of film, possible by displaying the action on a video monitor for the production crew to review.

In many instances, the camera crew runs a cable from the film camera to the video monitor to enable the director to review the different angles of the shots. While this method is obviously the most reliable method for reviewing camera angles and shots, in some instances it is simply not practical and wireless video assist devices are more suitable. For example, there may be instances where the location of the camera or cameras are not close enough to the video monitor to facilitate a cable connection. Another problem presented by cable connections is the fact that, for safety reasons, these cables must be tended by a utility person. This creates additional cost and congestion on the set. This is especially true for multi-camera work. Directors and producers must be mobile and they need a video source that can move with them. Wireless video assist devices would provide the optimum technical solution.

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auxiliary stations] to operate in all broadcast TV channels as proposed").

III. Technical Parameters

In order to assist the Commission in the allocation process, we provide the following technical parameters for use of the wireless video assist devices. Due to propagation concerns, bandwidth requirements, service restrictions, and incompatible uses, it is difficult, at best, to find suitable spectrum for use by the wireless video assist devices. Nevertheless, we believe that the Commission can provide adequate spectrum for the use of these devices by permitting their operation by the television and motion picture production industry on a secondary (non-interference) basis on vacant VHF and UHF channels at power levels not to exceed 2 watts. By vacant, we mean those VHF and UHF channels that do not have a primary user within 120 kilometers of the proposed site. While these frequencies are already being used by other services, such as wireless microphones, we believe that the benefits that will be realized by permitting the use of wireless video assist devices are of sufficient importance as to justify the operation of these devices in these frequencies. To that end, we request that wireless video assist devices be permitted to use, on a secondary, non-interference basis, VHF and UHF television channels at 174-216 MHz and 470-746 MHz. The wireless video assist devices can either be frequency selectable – in which the user would select the appropriate frequency in a given geographic area – or they can be pre-set by the manufacturer to correspond to a vacant television frequency in a given geographic area. AMPTP suggests that the Commission permit wireless video assist devices to be frequency selectable since it would provide the production crew with the flexibility to select the most appropriate frequency for the geographic area in which the crew is filming.

Since these devices will provide transport for audio, video, and time code in either analog or digital format within the available channel, we suggest a bandwidth of 6 MHz in order to give these devices sufficient operating flexibility. As suggested above, we propose that the maximum ERP for these devices will be 2 watts, the antenna height be limited to 10 meters from ground level, and the operating area be restricted to 300 meters, with the range specification being the limiting factor to the power.[3]

IV. Interference

Since these products will be an integral part of a very expensive and complex production set, the television and motion picture industry would take great care in the installation and use of these devices. Because interference with or to these devices could unduly delay production -- an unacceptable result -- users will take every effort to ensure that these devices are not operated on occupied broadcast channels. Moreover, we recognize that, as a secondary users, those using wireless video assist devices must accept whatever level of interference that is received from other radio operations. We also recognize that, as secondary users, those using wireless video assist devices are responsible for resolving any harmful interference problems caused by operation of these devices – even if resolution means the discontinued operation of these wireless video assist devices. To alleviate any concerns that the television broadcasters might have, AMPTP suggests that the Commission modify Part 74 to note that wireless video assist devices will avoid interference to the authorized services and will accept interference received from authorized television operations.

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[3] For example, in order to use the smallest fractional length antenna, the power of the transmitter will need to increase to cover 300 meters. Alternatively, if someone uses a ½ wave antenna, then the maximum power allowed would decrease so that the maximum range would not exceed 300 meters.

Given that these wireless video assist devices would operate at a very low power level (no more than 2 watts), AMPTP also believes that they will not cause interference to reception of adjacent VHF and UFH television channels. Furthermore, in order to prevent any possibility of interference with co-channel television reception, AMPTP suggests that the Commission adopt minimum co-channel separation requirements similar to those specified for low power auxiliary stations. In light of the fact that these devices will only be used on production sets that will be fairly limited in size, we believe that the potential for widespread interference is remote.

V. Conclusion

Wireless video assist devices will enable the television and motion picture production industry to meet its need for a mobile video source on production sets. Allowing the operation of these devices on unused VHF and UHF channels will maximize use of the radio spectrum without risking harmful interference or other degradation of quality or reliability to other radio operators. AMPTP believes that the proposals outlined above are not only feasible and easily incorporated into the Commission's rules, but that they are both practical and beneficial to the public interest as they promote more efficient use of the radio spectrum. Accordingly, AMPTP strongly

urges the Commission to initiate a rule making proceeding to adopt the proposals herein and issue a Notice of Proposed Rule Making on this matter.

Respectfully submitted,

Alliance of Motion Picture & Television Producers
15503 Ventura Boulevard
Encino, CA 91436

By: /s/ J. Nicholas Counter
J. Nicholas Counter III
President

Date: March 14, 2000